



## Notice of Service of Process

**SOP / ALL**  
**Transmittal Number: 19379637**  
**Date Processed: 02/18/2019**

**Primary Contact:** Sandra Adams  
United Services Automobile Association  
9800 Fredericksburg Rd  
San Antonio, TX 78288-0002

**Electronic copy provided to:** Danielle Lopez  
Jenna Meurer  
Ruby Esquivel  
Debra Brake  
Carmen Solis

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<b>Entity:</b>	USAA Insurance Agency, Inc. Entity ID Number 3692530
<b>Entity Served:</b>	USAA Insurance Agency, Inc.
<b>Title of Action:</b>	Kayla Bell vs. USAA Insurance Company
<b>Document(s) Type:</b>	Citation/Petition
<b>Nature of Action:</b>	Contract
<b>Court/Agency:</b>	St. Mary Parish District Court, LA
<b>Case/Reference No:</b>	133339 A
<b>Jurisdiction Served:</b>	Louisiana
<b>Date Served on CSC:</b>	02/18/2019
<b>Answer or Appearance Due:</b>	15 Days
<b>Originally Served On:</b>	CSC
<b>How Served:</b>	Personal Service
<b>Sender Information:</b>	La-Derical D. Wagner 337-365-4008

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**To avoid potential delay, please do not send your response to CSC**

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | [sop@cscglobal.com](mailto:sop@cscglobal.com)

CITATION

KAYLA BELL

Vs. No. 133339 Div "A"

USAA INSURANCE COMPANY UM  
INSURER



STATE OF LOUISIANA

16<sup>th</sup> JUDICIAL DISTRICT COURT

PARISH OF ST. MARY

To: USAA INSURANCE COMPANY, UM INSURER, THROUGH AGENT,  
CORPORATION SERVICE COMPANY, 501 LOUISIANA AVENUE, BATON  
ROUGE, LA 70802

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation or to file your answer or other pleading to said petition in the office of the Clerk of the 16<sup>th</sup> Judicial District Court in the St. Mary Parish Court House in the City of Franklin in said Parish within fifteen (15) days after the service hereof. Your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE AT FRANKLIN,  
LOUISIANA, JANUARY 31, 2019.

CLERK'S OFFICE, FRANKLIN, LA

CLIFF DRESSEL

Clerk of Court

St. Mary Parish, Louisiana

16<sup>th</sup> Judicial District Court

JAN 31 2019

A true copy of the original

Attest

Dy. Clerk of Court

The signature of Jennifer R. Delane is written in cursive over a horizontal line.

Deputy Clerk of Court

SPACE BELOW FOR SHERIFF'S RETURN

[ SERVICE ]

**KAYLA BELL**

**16<sup>TH</sup> JUDICIAL DISTRICT COURT**

**VS. NO. 1 3 3 3 9 DIV. "A" PARISH OF ST. MARY**

**USAA INSURANCE COMPANY STATE OF LOUISIANA**

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**PETITION FOR DAMAGES**

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The Petition of **KAYLA BELL**, a person of the full age of majority and resident of the parish of St. Mary, State of Louisiana, through undersigned counsel, who would, with respect, represent as follows, to wit:

Made defendant is **USAA INSURANCE COMPANY, UM INSURER**, an entity doing business in this parish. The Underinsured Motorist's insured is also domiciled within St. Mary Parish.

2.

Ms. Bell was involved in a motor vehicle accident operated and owned by defendant Solomon Williams, III on or about January 26, 2017. At all times, **USAA INSURANCE COMPANY** was providing coverage for the insured's vehicle. Go Auto has issued their liability limits in regards to the at fault party. At all times, there was UM coverage on the vehicle driven by Ms. Bell issued by **USAA INSURANCE COMPANY** under Policy Number: 038652845G71019.

3.

Ms. Bell was injured in the motor vehicle accident and has damages in excess of the liability as well as the UM coverage limits. Ms. Bell has suffered severe nerve damage as a result of the accident. It has been recommended and highly suggested that she take Cervical and Lumbar Epidural Steroid Injections. She has been in tremendous pain since the accident and continues to be in pain daily as of this date.

4.

Petitioner prays that she has attempted to settle this case within the policy limits of the defendants to no avail. Due to the UM carrier's failure to properly adjust the claim as outlined in Louisiana R.S. 22:1973 and 22:1892, Petitioner seeks all penalties entitled under the aforementioned statutes as she has submitted satisfactory proof of loss. USAA has not shown

good faith or fair dealing in adjusting this claim by not attempting to fairly compensate and settle this claim in accordance with their policy.

5.

Ms. Bell is currently seeking damages in excess of \$75,000.00.

6.

Petitioner prays that proceedings are heard and that a judgment is entered in favor of plaintiff, **KAYLA BELL**, and against **USAA INSURANCE COMPANY**, in the amount the Court deems reasonable and proper, together with legal interest, from judicial demand, until paid; all penalties under law; plus all costs of these proceedings, and for any further and other legal and equitable relief as the Court deems necessary and proper.

RESPECTFULLY SUBMITTED BY:



LA'DERICAL D. WAGNER (#29470)  
Attorney for Plaintiff  
111 French Street  
New Iberia, LA 70560  
Office: (337) 365-4008  
Facsimile: (337) 369-9003

PLEASE SERVE:

**USAA INSURANCE AGENCY, INC.**  
Through its registered agent:  
Corporation Service Company  
501 Louisiana Avenue  
Baton Rouge, LA 70802

A FACSIMILE OF THIS PLEADING  
WAS RECEIVED AND FILED ON

JAN 24 2019

CLERK'S OFFICE, FRANKLIN, LA

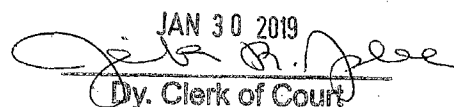
RECEIVED AND FILED

JAN 31 2019

A true copy of the original

Attest   
Dy. Clerk of Court

JAN 30 2019

  
Dy. Clerk of Court